REMARKS

Claims 1-3, 5-11, and 14-34 are pending in this application. By this Response, claims 1, 6, 11, 14, 20, 21, 24, and 26-31 are amended, claims 4, 12, and 13 are canceled and claims 32-34 are added. Claims 1, 14, 20, and 26 are amended to recite identifying at least one additional restricted application accessible using a single sign-on; displaying, to a user, information identifying the at least one additional restricted application; and in response to a user's selection, from the displayed information, of a selected additional restricted application from the at least one additional restricted application, providing access to the selected additional restricted application. Support for these amendments may be found at least on page 10, line 27, to page 11, line 15. Claim 11 is amended to incorporate the subject matter of canceled claims 12 and 13. Claims 6, 21, 24, and 27-31 are amended for clarification purposes and for proper antecedent basis in view of the amendments to claims 1, 14, 20, and 26. Claim 6 is further amended to recite that the document includes at least one of a list or menu and that the at least one list or menu includes areas that are selectable by the user. Support for these amendments may be found at least on page 10, line 27, to page 11, line 15. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Examiner, as the present claim amendments are only for facilitating expeditious prosecution of the allowable subject matter noted by the Examiner. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications. No new matter has been added by any of the above amendments to the claims. Reconsideration of the claims is respectfully requested in view of the following remarks.

I.   Drawings

The Office Action objects to the drawings stating that Figure 1 should be designated as "Prior Art." Applicants respectfully submit herewith a replacement sheet that designates Figure 1 as "Prior Art" in accordance with the Office Action's

requirement. Thus, Applicants respectfully request the objection to the drawings be withdrawn.

II.   35 U.S.C. § 112, Second Paragraph, Claims 4 and 20-31

The Office Action rejects claims 20-31 under 35 U.S.C. § 112, second paragraph, as being allegedly indefinite for failing to particularly point out and distinctly claim the subject matter, which applicants regard as the invention. This rejection is respectfully traversed.

With regard to claims 20-31, the Office Action states:

> 35 U.S.C. 112, sixth paragraph states that a claim limitation expressed in means-plus-function language "shall be construed to cover the corresponding structure...described in the specification and equivalents thereof." "If one employs means plus function language in a claim, one must set forth in the specification an adequate disclosure showing what is meant by that language. If an applicant fails to set forth an adequate disclosure, the applicant has in effect failed to particularly point out and distinctly claim the invention as required by the second paragraph of section 112." In re Donaldson Co., 16 F.3d 1189, 1195, 29 USPQ2d 1845, 1850 (Fed. Cir. 1994) (in banc). In summary, one of ordinary skill in the art would not understand what *structure* corresponds to the claimed function(s) of the respective claims. More specifically, "means for automatically logging in," "means for creating said token," "means for establishing a relationship and access level," etcetera, are all not covered by the **structures** presented in the specification **or** one of ordinary skill in the art would not understand which **structure** corresponds to each individually claimed function. Please note the list given is not exhaustive, but merely exemplary. Claims 20-31 that recite "means for" with a function do not have a corresponding *definite* structure within the specification. The Examiner is interpreting the claims as best understood (in the art) in the following art rejections.

(Office Action dated March 19, 2007, pages 2-3)

Applicants respectfully submit that Applicants' specification sets forth in the specification an adequate disclosure showing what is meant by the "means for" language at least on page 4, lines 24-27, and page 6, line 16 to page 7, line 19, which are reproduced as follows:

> While the computer system described in FIG. 1 is capable of executing the processes described herein, this computer system is simply one example of

a computer system. Those skilled in the art will appreciate that many other computer system designs are capable of performing the processes described herein.

(Applicants' specification, page 4, lines 24-27)

> Continuing with details of FIG. 2, communications between the first restricted application (user's host application) at 220 and the second restricted application at 230 serve as means for registering a first restricted application with a second restricted application. Consider the communications from the point of view of the server at 220. Processes under control of the first restricted application (at 220) serve as means for:
>> receiving from the user's client (210) a request (201) for access to the second restricted application (at 230);
>> determining for the user (at 210), and the second restricted application, what level of access should be granted; and
>> sending to the second restricted application (at 230) a request (202) to initiate an automatic log-in.

> Continuing with details of FIG. 2, consider the communications (via the Internet or some other network) from the point of view of the server at 230. Processes under control of the second restricted application (at 230) serve as means for:
>> receiving from the first restricted application (at 220), a request (202) to initiate the automatic log-in;
>> sending (203) to the user's client (210), via the first restricted application (at 220), a response (204), having a complete-automatic-log-in URL, and token;
>> receiving directly from the user's client (210) a request (205), having the token; and
>> sending directly to the user's client a response (206), having authenticated session information, and a welcome URL.
> (A request or response "having" the token or some other item means that the token or some other item is delivered with the request or response. The request or response includes, but is not limited to, the token or some other item. A request or response may vary from the specific examples shown in FIG. 2.)

> Processes under control of the second restricted application (at 230) serve as means responsive to the request (202) to initiate an automatic log-in, for:
>> creating the token;
>> storing the token; and
>> associating the token with the request (202) to initiate an automatic log-in.

(Applicants' specification, page 6, line 16, to page 7, line 19)

On page 4, lines 24-27, Applicants' specification states that the **computer system** described in FIG. 1 is capable of **executing** the **processes** described herein and, that those skilled in the art will appreciate that many **other computer system designs** are capable of **performing** the **processes** described herein. On page 6, line 16, to page 7, line 19, Applicants' specification states that the processes serve as means for receiving, sending, determining, creating, storing, associating, and the like. Thus, Applicants respectfully submit that one of ordinary skill in the art would understand which structure corresponds to each individually claimed function. That is, the computer system performs the processes when programmed with instructions causing the computer system to perform these processes.

With regard to claims 4, 24, and 30, the Office Action states:

> Claim 4, 24 and 30 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claim 4: "An application other than merely a security mechanism" makes the scope of the indefinite. One having ordinary skill in the art would not know how to interpret the claim. "'Security mechanism" is not defined, nor is anything beyond it defined (represented by "other than merely"). Claim 24 and 30: "could represent" is indefinite.

(Office Action dated March 19, 2007, page 3)

By this Response, claim 4 is canceled and claim 24 is amended to cancel the alleged indefiniteness by reciting "said token represents an appropriate level of access." Applicants respectfully submit that claim 30 does not contain the alleged indefinite term. Therefore, Applicants respectfully request withdrawal of the rejection of claims 4 and 20-31 under 35 U.S.C. § 112, second paragraph.

III.   35 U.S.C. § 101, Claims 26-31

The Office Action rejects claims 26-31 under 35 U.S.C. § 101 alleging that the claims are directed towards non-statutory subject matter. This rejection is respectfully traversed.

Regarding claims 26-31, Applicants have amended claim 26 to recite "A computer-usable **storage** medium." Claim 26 is amended in order to obtain expedited

allowance of the application. Claims 27-31 are amended to include similar subject matter. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Examiner, as the present claim amendments are only for facilitating expeditious prosecution of the allowable subject matter noted by the Examiner. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications. Therefore, Applicants respectfully submit that claims 26-31 are statutory. Thus, Applicants respectfully request withdrawal of the rejection of claims 26-31 under 35 U.S.C. § 101.

IV. Rejection under 35 U.S.C. § 102(b), Claims 1 and 4-31

The Office Action rejects claims 1 and 4-31 under 35 U.S.C. § 102(b) as being allegedly anticipated by Gupta et al. (U.S. Publication No. 2001/0037469 A1). This rejection is respectfully traversed.

Claim 1 reads as follows:

1.   A method for permitting access to applications, said method comprising:
        registering a first restricted application with at least one additional restricted application; and
        in response to a user performing only a single sign-on for said first restricted application,
        providing access to said first restricted application for said user;
        identifying said at least one additional restricted application accessible using said single sign-on;
        displaying, to said user, information identifying said at least one additional restricted application; and
        in response to a user's selection, from said displayed information, of a selected additional restricted application from the at least one additional restricted application, providing access to said selected additional restricted application. (emphasis added)

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034

(Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). Applicants respectfully submit that Gupta does not identically show every element of claim 1 arranged as they are in the claim. Specifically, Gupta does not teach the elements emphasized above.

Gupta is directed to authenticating users. Gupta externalizes the authentication mechanism from the application in the form of a login server, where the login server is the only server configured to handle authentication mechanisms. The application server checks if a request has an active and valid session and, if there is not a valid session, the application server redirects the user to the login server. The login server attempts to authenticate the user using any desired authentication mechanism and, once authenticated, the login server redirects the user back to the application server. The application server verifies the authentication directly with the login server. Once verified, the application server processes the user's request and responds accordingly. Further, communications between the application server and login server are transparent, or without any interaction from the user, although the user may see the browser communicating with each server.

Thus, Gupta merely receives a request from a user to access an application and, if the user does not have access, redirects the user to a login server. The login server authorizes the user and then grants access to the application if the login is successful. Nowhere, in the Gupta reference, is there any teaching regarding the identification of at least one additional restricted application accessible using a single sign-on or displaying information to the user that identifies the at least one additional restricted application. The Office Action alleges that Gupta teaches presenting to said user information identifying said at least one additional restricted application in paragraph [0073], which is reproduced as follows:

> [0073] FIG. 3 illustrates a method for authenticating a user according to one or more embodiments of the invention. At step 300, a user makes a URL request (or a network request). For example, the request may be initiated by entering a URL in a browser, clicking on a hyper link in the

browser, or forwarded from an HTML form or Applet which is running inside the browser.

(Gupta, paragraph [0073])

In paragraph [0073], Gupta describes a method for authenticating a user according to one or more embodiments of the invention. In Figure 3 and its related description in paragraphs [0073]-[0083], Gupta describes a user requesting access to an application. In requesting the access, the user's browser sends the request and associated cookies to the application server. The application server determines if the session indicated by the cookies is valid. If the cookies are not valid, the application server redirects the user's browser to an externalized login server. The login server attempts to authenticate the user with login server cookies. If the user is authorized, the login server creates a session for the user and redirects the user's browser to the application server with the session information, which includes the updated cookies. The application server then determines if the session indicated by the cookies is valid. If the session is valid, the application server determines if the user is authorized for the particular request. If the user is authorized to see the information, the information is returned to the user's browser. If the user is not authorized to see the information, the request is denied and an error is sent to the user's browser. Nowhere in Figure 3, or in any other section of Gupta, is at least one additional restricted application accessible identified using a single sign-on or is information displayed to a user that identifies the at least one additional restricted application.

The Office Action alleges that Gupta's login server is the equivalent of Applicants' first restricted application. As discussed above, Gupta's login server merely attempts to authenticate the user with login server cookies in response to the application server redirecting the user's browser to the login server. Then, in response to authenticating the user, the login server creates a session for the user and redirects the user's browser to the application server with the session information. Applicants respectfully submit that Gupta's login server does not display, to the user, information identifying a selection of at least one additional restricted application. Gupta merely sends a cookie to the user's browser, which is used by the browser to access the application that the user originally requested.

Furthermore, Gupta does not teach providing access to a selected additional restricted application in response to a user's selection, from the displayed information, of the selected additional restricted application from the at least one additional restricted application. The Office Action alleges that Gupta teaches providing access to the at least one additional restricted application in response to the user's selection in paragraph [0073], reproduced above. As discussed above, the user has already requested the desired application server with session cookies that the user's browser has stored **prior** to Gupta redirecting the user to the login server, which the Office Action alleges is the same as a first restricted application. Gupta does not display, to a user, information identifying the at least one additional restricted application. Thus, Gupta does not teach providing access to a selected additional restricted application **in response to a user's selection, from the displayed information, of the selected additional restricted application from the at least one additional restricted application.**

Moreover, there is no need for Gupta to perform such features. In Gupta, the user has already requested the desired application server with session cookies that the user's browser has stored. If the session cookies are valid, the application server grants access. Only when the session cookies are not valid does the Application server redirect the user's browser to the login server. Thus, as long as the user's session cookies are valid, the user can access any application server. Any transactions between the login server and any application server are transparent (see Gupta's abstract). At no time is there any display of information about other restricted applications that may be accessed by valid cookies.

Independent claims 14, 20, and 26 recite similar subject matter to that in independent claim 1. That is claim 14, which is representative of the other rejected independent claims 20 and 26 with respect to similarly recited subject matter, recites "in response to a user signing on to said first restricted application, identifying said second restricted application accessible using said sign-on; displaying, to said user, information identifying a selection of said second restricted application; and responsive to said user requesting access to said second restricted application by selecting from said information displayed to said user, automatically logging in to said second restricted application, for

said user, wherein no new key repository is required by said first and second restricted applications."

Thus, the present application provides that a user, who signs on to one restricted application, is provided with a display of information that identifies at least one additional restricted application. In response to the user selecting from the at least one additional restricted application, which is displayed to the user, access is provided to a selected additional restricted application.

Therefore, Gupta does not teach each and every feature of independent claims 1, 14, 20, and 26 as is required under 35 U.S.C. § 102(b). At least by virtue of their dependency on independent claims 1, 14, 20, and 26, the specific features of dependent claims 5-11, 15-19, 21-25, and 27-31 are not taught by Gupta. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1, 5-11, and 14-31 under 35 U.S.C. § 102(b).

Furthermore, Gupta does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. Absent the Office Action pointing out some teaching or incentive to implement Gupta such that at least one additional restricted application is identified that is accessible using said single sign-on; information is identified to a user that identifies said at least one additional restricted application; and, in response to a user's selection, from the displayed information of a selected additional restricted application from the at least one additional restricted application, access is provided to the selected additional restricted application, one of ordinary skill in the art would not be led to modify Gupta to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify Gupta in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the Applicants' disclosure as a template to make the necessary changes to reach the claimed invention.

Moreover, in addition to their dependency from independent claims 1, 14, 20, and 26, the specific features recited in dependent claims 5-11, 15-19, 21-25, and 27-31 are not taught by Gupta. For example, with regard to claim 6, Gupta does not teach a first restricted application sending a document in hypertext markup language, wherein said document includes at least one of a list or menu and wherein said at least one list or menu

includes areas that are selectable by the user. The Office Action alleges that Gupta teaches a first restricted application sending a document in hypertext markup language in paragraph [0076], which is reproduced as follows:

> [0076] If there is no valid session, the application server redirects the client's request to a login server at step 306. To redirect a request, the application server sends a redirect message (with the login server's URL) back to the client's browser. The redirect message may also include the application's URL, a cookie for the application, and a temporary identifier. When a browser receives a redirect message, the browser automatically sends a request to the specified URL (e.g., the login server's URL) without any interaction from the user along with any existing cookies (or tokens) for the specified URL.

(Gupta, paragraph [0076])

In paragraph [0076], Gupta merely describes an application server redirecting the user's browser to a login server using a redirect message that may include the application's URL, a cookie for the application, and a temporary identifier. Applicants respectfully submit that neither a URL, a cookie for the application, or a temporary identifier is a document. Furthermore, the Office Action states that Gupta's login server is equivalent to Applicants' first restricted application and Gupta's application server is equivalent to Applicants' at least one additional restricted application. In the cited section of Gupta the **applicant server,** i.e. the at least one additional restricted application, **sends** the redirect message that may include the application's URL, a cookie for the application, and a temporary identifier. In contradistinction, Applicants' claim recites a first restricted application sending a document in hypertext markup language. In paragraph [0078] of Gupta, Gupta describes that the login server redirects the user's browser back to the application server along with session information and a cookie. Furthermore, Gupta does not teach a first restricted application sending a document in hypertext markup language, where the **document includes at least one of a list or menu** and wherein **the at least one list or menu includes areas that are selectable by the user.**

With regard to claim 7, Gupta does not teach wherein said user's selection further comprises: receiving via said first restricted application a selection signal from said user, and, in response to said selection signal, sending via said first restricted application a request for access to said at least one additional restricted application. The Office Action

alleges that these features are taught by Gupta in paragraph [0073], which is reproduced above. As discussed above, Gupta's user requests the application server first and then is redirected to the login server, i.e. the first restricted application, if the login session is not valid. Gupta's login server does not identify at least one additional restricted application accessible using a single sign-on or display information to the user that identifies the at least one additional restricted application. Thus, Gupta does not teach receive via said first restricted application a selection signal from said user. Furthermore, Gupta does not send via said first restricted application a request for access to said at least one additional restricted application in response to said selection signal. In fact, Gupta teaches the complete opposite. That is, Gupta teaches sending via an application server, i.e. said at least one additional restricted application, a request for access to a login server, i.e. said first restricted application, in response to requesting access to the application server.

Thus, in addition to being dependent on independent claims 1, 14, 20, and 26, the specific features of dependent claims 5-11, 15-19, 21-25, and 27-31 are not taught by Gupta by virtue of the specific features recited in these claims. Accordingly, Applicants respectfully request withdrawal of the rejection of dependent claims 5-11, 15-19, 21-25, and 27-31 under 35 U.S.C. § 102(b).

V. Rejection under 35 U.S.C. § 103(a), Claims 2 and 3

The Office Action rejects the subject matter of claims 2 and 3 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Gupta et al. (U.S. Publication No. 2001/0037469 A1). This rejection is respectfully traversed.

The Office Action bears the burden of establishing a *prima facie* case of obviousness based on the prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). In this case, Gupta does not teach or suggest all of the features alleged to be present by the Office Action. Also, the cited reference does not provide any teaching, suggestion, or incentive to combine or modify the teachings in the manner necessary to reach the presently claimed invention.

Furthermore, Gupta fails to teach or suggest the features of claims 2 and 3. For example, with regard to claims 2 and 3, Gupta does not teach or suggest performing a

single registration for all authorized users of said first restricted application or performing a plurality of registrations, for a plurality of groups of authorized users of said first restricted application; and providing an access level for each of said groups. The Office Action fails to provide a section of Gupta that teaches these features and seems to admit that "Gupta et al. fail to teach said system and method in the plurality (recited as "performing a plurality of registrations" of groups of users)." However, the Office Action alleges that "it would have been obvious at the time of the invention was made to one having ordinary skill in the art to include the ability of multiple registrations for respective multiple users because it has been held that mere duplication of the essential working parts of a device involves only routine skill in the art." Applicants respectfully disagree.

Gupta is directed to **a user** being authorized to access an application server. Duplicating Gupta's systems, as alleged by the Office Action, would merely result in each one of a group of users being authorized **individually** by Gupta's login server. Gupta provides no mechanism whatsoever to authorize a plurality of user **using a single registration**.

Furthermore, no suggestion is present in the references to modify the reference to include such a feature. That is, there is no teaching or suggestion in Gupta that a problem exists for which performing **a single registration** for all authorized users of said first restricted application or performing a plurality of registrations, for a plurality of groups of authorized users of said first restricted application; and providing an access level for each of said groups, is a solution. That is, one of ordinary skill in the art, being presented with Gupta, and without having a prior knowledge of Applicants' claimed invention, would not have found it obvious to modify Gupta to arrive at Applicants' claimed invention, as recited in claim 1. To the contrary, even if one were somehow motivated to modify Gupta the result would not be the invention, as recited in claim 1. The resulting system would merely authorize individually each one of a group of users. The resulting system would still fail to performing a single registration for all authorized users of said first restricted application or performing a plurality of registrations, for a plurality of groups of authorized users of said first restricted application; and providing an access level for each of said groups.

In view of the above, Applicants respectfully submit that Gupta fails to teach or suggest the features of claim 1. At least by virtue of their dependency on claim 1, the features of dependent claims 2 and 3 are not taught or suggested by Gupta. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 2 and 3 under 35 U.S.C. § 103(a).
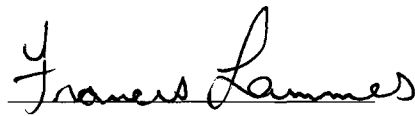
VI.   <u>New Claims</u>

Claims 32-34 are added to the pending application. Claims 32-34 recite subject matter similar to claim 6. Consequently, no new matter is added. At least by virtue of their dependency on independent claims 14, 20, and 26, the specific features of dependent claims 32-34 are not taught by Gupta. Furthermore, as discussed above with regard to claim 6, Gupta teaches sending a URL, a cookie for the application, or a temporary identifier, which are not documents. Applicants' claim recites a first restricted application sending a document in hypertext markup language. That is, Gupta describes that the login server redirects the user's browser back to the application server along with session information and a cookie. Furthermore, Gupta does not teach a first restricted application sending a document in hypertext markup language, where the **document includes at least one of a list or menu** and wherein **the at least one list or menu includes areas that are selectable by the user.**

VII. Conclusion

It is respectfully urged that the subject application is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

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